



# St. Cuthberts

WOLVES LANE

## General Data Privacy Notice

The Parochial Church Council of St Cuthbert's Chitts Hill, N22 5JD

Being connected to a community of people – a family, a team of colleagues, a voluntary organisation – involves appropriate and helpful communication. As a church community, we are no different. We need to communicate **to keep people informed** about things that are going on, and **to coordinate our activity** (as lots of people serve and are served as part of church life). For a community of people our size, that requires some administration and organisation to help people stay appropriately informed, connected and cared for.

As we do that, your privacy is important to us. **We do our best to process any personal data in ways that are lawful, fair and transparent, accurate, relevant, up to date and in line with people's consent.**

By providing your personal details, you agree to allow St Cuthbert's to contact you either on the basis of the consents you have given us, or for our Legitimate Interests in accordance with current data protection regulations.

### 1. Your personal data – what is it?

“**Personal data**” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address).

Identification can be by the information alone or in conjunction with any other information. The processing of personal data is governed by General Data Protection Regulation (the “GDPR”).

### 2. Who are we?

This Privacy Notice is based on the standard wording set out by the Church of England and is provided to you by **the Parochial Church Council of St Cuthbert's Church, Chitts Hill** (“the PCC”) which is the data controller for your data. (Contact details are below).

The Church of England is made up of a number of different organisations and office-holders who work together to deliver the Church's mission in each community. The PCC works together with:

- the Priest-in-Charge of St Cuthbert's;
- the bishops of the Diocese of London; and
- the London Diocesan Fund, (which is responsible for the financial and administrative arrangements for the Diocese of London).

As the church brings together all of these persons and organisations working together, we may need to share personal data we hold with them so that they can carry out their responsibilities to the PCC, church and local community. The organisations referred to above are joint data controllers. This means they are all responsible for how data is processed.

Each of the data controllers have their own tasks within the Church and a description of what data is processed and for what purpose is set out in this Privacy Notice. This Privacy Notice is sent to you by the PCC on our own behalf and on behalf of each of these data controllers. In the rest of this Privacy Notice, we use the word “we” to refer to the appropriate data controller.

### 3. How & why do we process your personal data?

We use your personal data for some or all of the following purposes:

#### To coordinate our ministry & activities

- **To enable us to serve and minister to you** and provide you with pastoral and spiritual care (such as visiting you when you are gravely ill or bereaved) and to organise and perform ecclesiastical services for you, such as baptisms, confirmations, weddings and funerals;
- **To enable you to serve and take part in our ministry** to deliver the Church’s mission to our community, and to carry out any other voluntary or charitable activities for the benefit of the public as provided for in the constitution and statutory framework of each data controller;
- **To carry out comprehensive safeguarding procedures** (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and adults-at-risk are provided with safe environments;
- **To send you communications which you have requested** and that may be of interest to you. These may include information about church services, activities, courses, events, financial appeals, or other fundraising activities, besides notice of changes to services, events or role holders;

#### To administer our ministry & activities

- **To seek your views or comments;**
- **To meet all legal and statutory obligations** (which include maintaining and publishing our church electoral roll in accordance with the Church Representation Rules);
- To administer membership records for the parish, deanery, archdeaconry and diocese;
- To fundraise and promote the interests of the Church and charity;
- To maintain our own accounts and records;
- To process a donation that you have made (including Gift Aid information);
- To process a grant or application for a role;
- Our processing may also include the use of CCTV systems for the prevention and prosecution of crime.

The data controllers will comply with their legal obligations under the GDPR to keep personal data up to date; to store and destroy it securely; to not collect or retain excessive amounts of data; to keep personal data secure, and to protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data.

#### 4. What data do the data controllers listed above process?

They will process some or all of the following where necessary to perform their tasks:

- **Names**, titles, and aliases, photographs;
- **Contact details** such as telephone numbers, addresses, and email addresses;
- Where they are relevant to our mission, or where you provide them to us, we may process demographic information such as gender, age, date of birth, marital status, nationality, education/work histories, academic/professional qualifications, hobbies, family composition, and dependants;
- Where you make donations or pay for activities, **financial identifiers** such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers;
- The data we process is likely to constitute sensitive personal data because, as a church, the fact that we process your data at all may be suggestive of your religious beliefs. Where you provide this information, we may also process other categories of sensitive personal data: racial or ethnic origin, sex life, mental and physical health, details of injuries, medication/treatment received, political beliefs, labour union affiliation, genetic data, biometric data, data concerning sexual orientation and criminal records, fines and other similar judicial records.

#### 5. What is the legal basis for processing your personal data?

We process personal data where

- **Explicit consent has been given** by the data subject so that we can keep you informed about news, events, activities and services and process your gift aid donations and keep you informed about diocesan events.
- **Processing is necessary for carrying out obligations** under employment, social security or social protection law, or a collective agreement;
- **Processing relates to members or former members** (or those who have regular contact with it in connection with those purposes); and where there is no disclosure to a third party without consent.

Most of our data is processed because it is necessary for our legitimate interests, or the legitimate interests of a third party (such as another organisation in the Church of England). An example of this would be our safeguarding work to protect children and adults at risk. We will always take into account your interests, rights and freedoms.

We may also process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be processing your data in connection with the hire of any church facilities.

Where your information is used other than in accordance with one of these legal bases, we will first obtain your consent to that use.

## 6. Sharing your personal data

**Your personal data will be treated as strictly confidential.** It will only be shared with third parties where it is necessary for the performance of our tasks or where you first give us your prior consent. It is likely that we will need to share your data with some or all of the following (but only where necessary):

- The appropriate bodies of the Church of England including the other data controllers;
- Our agents, servants and contractors. For example, we may use the services of a commercial provider to send out newsletters on our behalf, to maintain our database software, or to process donations, payments or ticketing.
- Other clergy or lay persons nominated or licensed by the bishops of the Diocese of London to support the mission of the Church in our parish. For example, our clergy are supported by our area dean and archdeacon, who may provide confidential mentoring and pastoral support. Assistant or temporary ministers, including curates, deacons, licensed lay ministers, commissioned lay ministers or persons with Bishop's Permissions may participate in our mission in support of our regular clergy;
- Other persons or organisations operating within the Diocese of London including, where relevant, the London Diocesan Board for Schools and Subsidiary Bodies;
- On occasion, other churches with which we are carrying out joint events or activities.

**Data will only be shared with other members of the church in order to carry out a service to other church members or for purposes connected with the church.** (i.e. to enable you to be served by a volunteer or to coordinate your voluntary service to others).

## 7. How long do we keep your personal data?

We keep data in accordance with the guidance set out in the guide "Keep or Bin: Care of Your Parish Records" which is available from the Church of England website.<sup>1</sup>

Specifically, we retain electoral roll data while it is still current; gift aid declarations and associated paperwork for a minimum period of 6 years after the calendar year to which they relate (in line HMRC guidance). We maintain parish registers (baptisms, marriages, funerals) permanently.

In general, we will endeavour to keep data only for as long as we need it. This means that we may delete it when it is no longer needed.

## 8. Your rights and your personal data

Your rights with respect to your personal data are listed below. When exercising any of these rights, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

- **The right to access information we hold on you.** At any point you can contact us to request the information we hold on you as well as why we have that information, who has access to the information and where we obtained the information from. Once we have received your request we will respond within one month.

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<sup>1</sup> Details about retention periods can currently be found in the Record Management Guides located on the Church of England website at: - <https://www.churchofengland.org/about-us/structure/churchcommissioners/administration/librariesandarchives/recordsmanagementguides.aspx>

(There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee).

- **The right to correct and update the information we hold on you.** If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.
- **The right to have your information erased.** If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold. When we receive your request we will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).
- **The right to object to processing of your data.** You have the right to request that we stop processing your data. Upon receiving the request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims.
- **The right to data portability.** You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.
- **The right to withdraw your consent** to the processing at any time for any processing of data to which consent was sought. You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).
- **The right to object to the processing of personal data** where applicable.
- **The right to lodge a complaint** with the Information Commissioner's Office.

## 9. Further processing

If we wish to use your personal data for a new purpose, not covered by this Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

## 10. Contact Details

Please contact us if you have any questions about this Privacy Notice or the information we hold about you or to exercise all relevant rights, queries or complaints at:

The Data Controller, St Cuthbert's Church, 85 Wolves Lane, Wood Green, N22 5JD

Email: [office@stcuthbertschurch.org.uk](mailto:office@stcuthbertschurch.org.uk)

You can contact the Information Commissioners Office

- on 0303 123 1113 or
- via email <https://ico.org.uk/global/contact-us/email/> or
- at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

St Cuthbert's PCC  
*Reviewed and approved*  
*27<sup>th</sup> August 2019*